



GAMING CONTROL BOARD

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April 14, 1995

POLICY MEMORANDUM

Requirements for a Single 24-hour Shift in Pit areas

The Board has received numerous inquiries from Nevada casinos concerning the use of other than the standard three eight-hour shifts for pit operations, with the preference being for a single 24-hour shift. The Board's primary concern regarding the approval of one 24-hour shift is whether pit employees can be held sufficiently accountable for their performance and assigned assets.

In a table game, assigned assets are the table inventories, monies contained in drop boxes, and documentation placed into the drop box. Since a table game does not produce a record of each transaction that occurs at a table, specific supervisory personnel are responsible for evaluating the controls during a specific time period and are accountable for the protection of their assigned assets.

The Board generally supports the concept of a single 24-hour shift; however, each casino's internal control structure must be evaluated prior to receiving approval. In evaluating each casino's 24-hour shift approval request, the following three general criteria will be considered by the Board:

- The licensee should be in good standing with the Board.
- The licensee should have no history of financial or regulatory compliance problems. Additionally, there should have been no games statistical performance concerns.
- The licensee should have an excellent internal control environment.

With regards to the last criteria, the internal control structure should provide for adequate security and auditability. Controls over fill/credit and marker transactions occurring in the pit must be sufficient to preclude any false or altered documents. The use of computerized pit and cage systems, and the number of employees involved in the completion of each gross revenue affected transaction, will be examined. A pit running count of currency placed in drop boxes, with a subsequent reconciliation to the final count figures by the accounting department, will also be considered.

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The surveillance system must provide adequate coverage to follow chip and personnel movements throughout the casino as well as coverage of the casino patrons. Pit personnel should be monitored for performance and rotated in order to prevent collusion between employees. Physical controls over cards, dice and drop boxes on closed tables (i.e., table drop paddles are locked or table drop slots being fully covered when pits are closed) should be sufficient.

The licensee should have the ability to adequately respond to statistical deviations in games performance. Player tracking/rating provides a primary source of information for follow-up on statistical deviations. In order to gather sufficient information, the casino must accurately track or rate a majority of their cash and credit play. Unusual game statistics must be followed up, resolved and explanations documented on a timely basis.

Finally, the Board will also evaluate the licensee's independent monitoring systems that are in place. This evaluation will include the quantity and quality of pit and cage observation procedures performed by the surveillance and security departments (and if applicable, corporate security) and the observations and testing performed by the licensee's internal audit department.

If a licensee who has been approved to operate using a single 24-hour shift at any time fails to operate within the control procedures outlined, or if significant long-term statistical deviations evolve in the pit department which cannot be adequately explained, the Board will consider revoking the 24-hour shift approval.

Group I or II nonrestricted licensees that wish to convert to other than the standard three 8-hour shift schedule should request a variation of Table Games Minimum Internal Control Standard No. 54. The request should explain how the operation meets the criteria described in this policy memorandum. The Board will consider the attributes of each casino operation on a case-by-case basis.